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Building:

Author:

Regulatory Contact:

Date Range: From To

Keyword:

< > (1 of 37)

Number 2

Date and Time 6/12/1995

Primary Site Contact	Kyle Peter	Primary Reg Contact	Fred Dowsett
Secondary Site Contact		Secondary Reg Contact	

Unit	Building	Site Phone	Agency
		*7752	CDPHE

Purpose

Following the DOE Residue Workshop on 6/12/95, Fred Dowsett, Cathy Alstatt, Ken Niswonger (CDPHE) and Pam Edrich, Med Durel, Randy Leitner, Eric Espinosa, and Kyle Peter (EG&G) discussed the applicability of waste codes F003 and F039. The F003 discussion was precipitated by CDPHE removing the waste codes from the draft Part B permit for permit modification #28 (750 Pad Tank Storage). The F039 discussion was also initiated by CDPHE as a result of several previous discussions.

ADMIN RECORD

IA-A-001089

Discussion

F003 I began by stating that we agree with Fred that F003 should not apply to non ignitable waste, but that we wanted to continue to apply the code in order to better track those wastes to ensure that the LDR treatment standard for F003 is met when the waste is eventually treated. I mentioned that removing F003 from thousands of container labels was not an efficient use of resources. I also mentioned that we would only leave F003 on containers which were also hazardous for other reasons and that we do not have any containers which are not ignitable and only hazardous for F003. Fred responded by saying that if the waste is not ignitable, F003 does not apply. He feels that the vast majority of aqueous process waste historically generated at the Site was not ignitable as generated (i.e., when poured into the process waste system) and therefore should not carry the F003 code nor does it need to be treated to meet LDR treatment standards for F003. He also indicated that F003 waste generated prior to the promulgation of the LDR treatment standards does not need to be treated to those standards. F039 Fred offered guidance on the applicability of the waste code F039. He indicated that F039 applies to the disposal of multiple waste streams and does not necessarily apply to a single waste stream with multiple listed constituents. This guidance, as it relates to the Site, means that leachate from the solar evaporation ponds would not be considered F039 because the ponds have historically accepted wastes from known sources, which, when consolidated in the ponds, can be considered a single waste stream. Another example of a situation which would not generate F039 waste would be a trench which was historically used for the disposal of one waste stream such as paint solvent. This would be considered a single waste stream, despite having different individual listed codes. Conversely, if the same trench had historically accepted multiple waste streams such as paint solvent, machining solvent, unused commercial chemical products, etc., then the resulting leachate would be F039. The present landfill has historically accepted listed hazardous waste from several unknown streams. Subsequent leachate from these multiple listed waste streams would potentially result in the generation of F039 waste.

Follow-Up

Follow-up Required: (1) Notify pertinent Site personnel of this guidance (done with distribution of this contact record). (2) Inform Pam Edrich/Med Durel of this guidance for incorporation into the Backlog Recharacterization and WSRIC programs (K. Peter). (3) Issue sitewide guidance informing generators and unit owners how to manage existing containers and tanks which need to be recharacterized (K. Peter/P. Edrich/M. Durel).

Please contact Wayne Moe at extension 4808 for assistance with this page.

